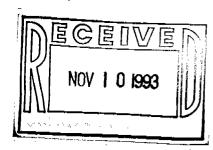


HOMEOWNERS & CONTRACTOR TOOLS

510 N. ELM, ST. GREENSBORO, NC 27401 275-9788 1345 S. CHURCH STREET BURLINGTON, NC 27215 226-8287

November 9, 1993

Ms. Kelly Gage Guilford Cty. Dept. Emergency Services P. O. Box 18807 Greensboro, NC 27419



Dear Ms. Gage,

The enclosed report documents the activities surrounding the removal of one 1,000-gallon, gasoline Underground Storage Tank (UST) and petroleum contaminated soil remediation at the A-1 Rentals facility located at 510 N. Elm Street in Greensboro North Carolina (see Figure 1). Site work was performed on April 13, 1993 and June 1, 1993.

This report is submitted to comply with the October 1,1993 Notice of Violation and is intented to conform with UST Closure and Site Investigation Report requirements outlined in 40 CFR 280.72 and 15A NCAC 2N .0700. We hope that this information will meet your needs and clarify any questions or concerns with regard to this subject. If you have any questions, or if additional information is needed, please feel free to contact Don Johnson at (919)275-9788. We appreciate your patience and assistance in these matters.

Sincerely,

Don Johnson President



UST Closure and Site Investigation Report

A-1 Rentals Greensboro, North Carolina

November 4, 1993

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1. Introduction

Bobby's Backhoe Service was contracted by A-1 Rentals to removal of one 1,000-gallon, gasoline Underground Storage Tanks (USTs) from the A-1 facility located at 510 N. Elm Street in Greensboro, North Carolina (see Figure 1). Site work was performed on April 13, 1993 and June 1, 1993.

This UST Closure and Site Investigation Report will satisfy state and federal requirements under 40 CFR 280.72 and 15A NCAC 2N .0803. In connection with these requirements, a Site Investigation Report for UST Closure (form GW/UST-2) is included as Appendix A.

2. Scope of Work

In order to perform permanent closure of the USTs in accordance with state and federal requirements, the following scope of work was developed:

- Prepare UST for Removal
- Remove and dispose of the USTs
- Conduct visual field screening and observation in order to identify any potential petroleum hydrocarbon-impacted soil.
- Perform site characterization including sample collection as required
- Prepare a report detailing site activities and findings

3. Preparation for UST Removal

Prior to removal of the USTs, all required notifications were filed with state and local agencies. These notifications included a 30-day advance notification to the North Carolina Department of Environment, Health & Natural Resources (DEHNR) and contact with the local fire department.

After mobilizing to the site, soil above the UST was removed until the point at which the top of the tank was exposed (approximately 3 feet below grade). At this point, all product lines were disconnected and removed. The product lines lead to the pump dispenser which was located directly above the UST as illustrated in Figure 2.

For safety, the internal atmosphere of each UST was tested with a lower explosive level meter (explosimeter) before additional activity. The vapors inside the tanks were lowered to be less than 10 percent of the lower explosive limit. Therefore, in accordance with American Petroleum Institute publication 1604, it was considered safe to continue with UST removal. Periodic vapor monitoring with the lower explosive level meter ensured

continued safety during tank removal.

As illustrated in Figure 2, UST-1 contained gasoline. No significant amounts of residuals remained in the tanks. Therefore, it was unnecessary to pump the tank prior to additional activity.

4. UST Removal and Disposal

The UST which was removed from the subject site was located on the north side of the facility, as illustrated in Figure 2. Excavation around the tank proceeded to the depth of the bottom of the tank. At that point, the UST was removed, cleaned of debris, and inspected for any indications of a release. The results of this inspection are included in Table 1.

Table 1: UST Size and Condition

UST #/Former Contents	Capacity/ Dimensions	Condition
UST #1 Gasoline	1000 gallons 64" x 12'	corrosion w/ a few small holes

Following inspection, each tank was labelled in preparation for transporting it to Safeway Tank Disposal in Colfax, North Carolina. The Certificate of Disposal is included as Appendix B.

5. Field Observations and Screening

Throughout excavation, soil was screened visually to determine the potential presence or absence of petroleum hydrocarbons (see Table 2).

Table 2: Field Observations

Area	Observations
UST #1	Soil staining and odor in cover material and along the east end of the tank excavation, possibly due to overfills. No piping leak evidence.

Groundwater was not encounter during site activities.

6. Soil Sampling

6.1 Soil Sample Collection Procedure

As part of the limited site assessment required under 40 CFR 280.72 and 15A NCAC .0803, soil samples were collected from the native soil located beneath the UST at approximately 11 feet below grade, at the locations illustrated in Figure 2. When sampling equipment was reused, personnel used the following procedure in order to prevent cross-contamination:

- 1. Wash with nonphosphate detergent and water, brush to remove particulate matter.
- 2. Rinse with tap water.
- 3. Rinse with 10 percent nitric acid solution.
- 4. Rinse with deionized water.
- 5. Rinse with pesticide-grade isopropyl alcohol.
- 6. Rinse with deionized water.
- 7. Air dry as long as possible.

As an additional measure in preventing cross-contamination, latex gloves were worn by the sampling technician during these activities. Gloves were changed between samples.

The samples were packed in ice and maintained at 4°C during shipment to Research & Analytical Laboratories, Inc. in Kernersville, North Carolina for analysis. Chain of custody forms and analytical reports are included in Appendix C. Results are discussed in the sections that follow.

6.2 Analytical Methods and Results

Soil samples collected beneath UST-1 were initially analyzed for Total Petroleum Hydrocarbons (TPH) using EPA Method 5030. Results are presented in Table 3. A copy of the original laboratory report is included as Appendix C.

Table 3: Laboratory Results for Soil Samples
TPH in parts per million

Sample	EPA Method 5030
East-2000	1,494
West-2000	< 10

As illustrated in Table 3, results of laboratory analysis indicate detections of gasoline in the form of Total Petroleum Hydrocarbons along the east end of the tank excavation.

7. Additional Excavation and Sampling

Bobby's Backhoe Service remobilized to the site on June 1, 1993 to remove additional contaminated soil from the excavation. Additional soil was excavated vertically approximately 6 feet beneath the original excavation extent (to a final depth of approximately 17 feet below grade), and laterally to the final dimensions of the pit as illustrated in Figure 2.

During the additional excavation, approximately 104 tons of Petroleum Contaminated soil were removed and loaded directly into dump trailers and hauled to Carlisle Farms, Inc. in Autryville, North Carolina for disposal. Copies of the Non-Hazardous Waste Manifest are included in Appendix D.

Five confirmation samples (Gas tank North, Gas tank South, gas Tank East, Gas tank West, and Gas tank bottom @ 17', see figure 2) were collected from the expanded excavation. The samples were shipped to Guilford Laboratories, Inc. for analysis for TPH via EPA Method 5030. Results of the analysis are illustrated in Table 5.

Table 5: Confirmation Soil Samples EPA Method 5030 in parts per million

Sample location	Result
Gas tank North	< 10
Gas tank South	< 10
Gas tank East	< 10
Gas tank West	< 10
Gas tank bottom @ 17'	< 10

Note: < 10 = less than 10 ppm Total Petroleum Hydrocarbons

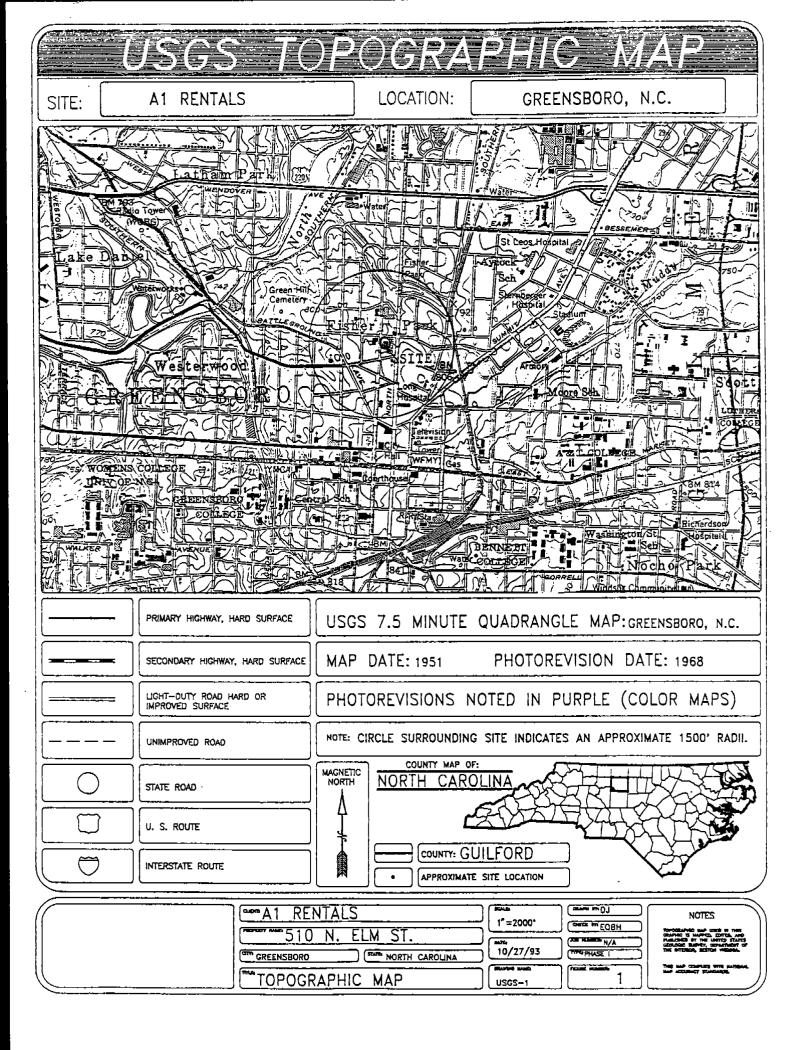
As illustrated in Table 5, results indicate the no remaining Total Petroleum Hydrocarbon concentrations in excess of 10 ppm TPH, the North Carolina action level for petroleum contaminated soils. Therefore, no additional excavation or remedial actions were consider necessary.

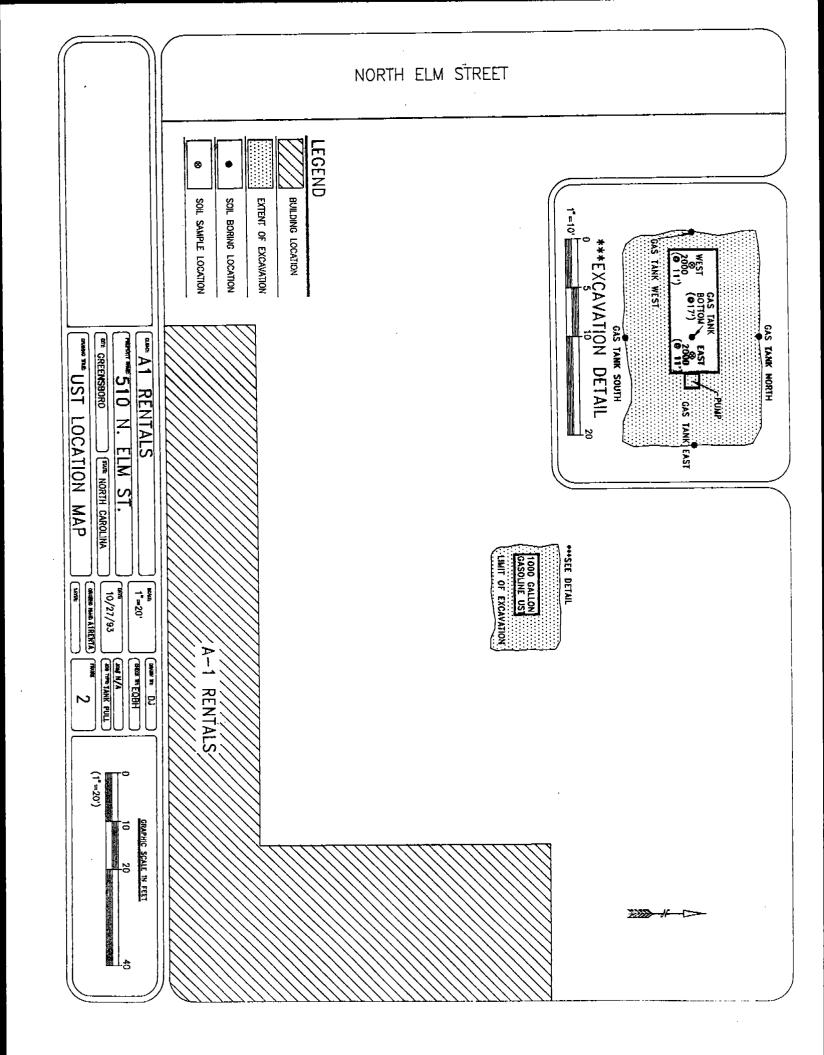
8. Summary

One UST was removed from the subject site and disposed of off-site. Evidence of potential soil impact was observed beneath UST-1, which had contained gasoline. Laboratory analysis confirmed petroleum hydrocarbon contamination.

Additional soil excavation was performed to the depth of approximately 17 feet below grade, and confirmation samples were collected. Analysis of the samples indicated that the limited additional excavation was successful at remediating the petroleum hydrocarbon contamination soils to less than 10 part per million Total Petroleum Hydrocarbons (TPH), the state action limit. Therefore no additional remediation should be necessary in accordance the North Carolina Guidelines for the remediation of petroleum contaminated soils.

All soil which was removed from the excavation were loaded directly into dump truck and transported for disposal at Carlisle Farms Inc..





Appendix A
Site Investigation Report for UST Closure

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GW/	UST-2	White Copy	- Regional Office	Yellow (<u></u> Cocy -	Central C			Blue Copy	- Owner



State of North Carolina Department of Environment, Health, and Natural Resources Winston-Salem Regional Office

James B. Hunt, Jr., Governor

Jonathan B. Howes, Secretary

DIVISION OF ENVIRONMENTAL MANAGEMENT
GROUNDWATER SECTION

Feb. 12 1993

A-1 Rental) 510 D. Elm 54. Dreensbors nc 27401
Dear Ju:
This letter is to acknowledge your Notification of Tank Closure as received Let 4/993 and filed as A-/ Rentals All future correspondence must contain the file name as well as address and county in the subject to ensure its receipt into out filing system.
The results of the required assessment (NCAC Title 15A Subchapter 2N Section .0803 and 40 CFR Part 280.72) should be submitted to this office no later than thirty (30) days after the tank is closed. If there is evidence of a release or suspected release, it must be reported within twenty-four (24) hours.
Also, please remember that to permanently close a tank, owners and operators must empty and clean it by removing all liquids and accumulated sludges as required under 15A 2N .0802 and 40 CFR 280.71(b).
Groundwater Section staff will be conducting random site visits to ensure that underground storage tank closures are conducted as required in 15A 2N .0802 and .0803 and 40 CFR 280.71 and 280.72. Any violations documented may be submitted for enforcement action.

Enclosed is an attachment that is to be used for the information required for closure assessment. You may contact Kelly Gage or Sharon Cihak at (919) 373-7565 if you have any questions concerning these requirements.

W. Washell Water

Sincerely,

W. Waddell Watters Hydrogeologist II

WWW/ahl Enclosure

cc: MSRO RACKLAR

(GW/UST-3) Notice of Intent: US	T Permanent Clo	sure or Change-In-Service D
FOR TANKS IN Return Completed Form To: The appropriate DEM Regional Office according to the location. [SEE REVERSE SIDE OF OWNER'S COPY OFFICE ADDRESS].	State Us No Gly Dept. of EH	
INSTRUC Complete and return thirty (30) days		
L'OWNERSHIP OF TANK(S)		OCATION OF TANK(S)
Tank Owner Name: A-/ Kental (Corporation, Individual, Public Agency, or Other Entity)	3	mpany A-1 Kentals
Street Address: 510 N. Elm 57.	Facility ID # (if availa	
County: Guilford	Street Address or Sta	ate Road: 510 N. Elm 54.
City Corcers bolo State: NC Zip Code: 27401	1	City: Greens boes zip Code:
Tele. No. (Area Code): 919-275-9788	Tele. No. (Area Code	9: <u>99-275-9788</u>
III. CON	TACT PERSON	
Name: Dwight WALL Job Title:	Te	elephone Number:(919)213-8663
IV. TANK REMOVAL, CLOSURE	IN PLACE, CHANGE	IN-SERVICE
 Conduct Site Soil Assessments. If Removing Tanks or Closing in Place refer to API Publications. 2015 "Cleaning Petroleum Storage Tanks" & 1604 "Removal & Disposal of Used Underground Petroleum Storage Tanks". 	Permanent Clo following the s 7. Keep records	
(Contractor) Name: Bobby's Buckhoe Bervi Address: 1324 Wiley Blavis Ed State:	NC NC	Zip Code: <u>21406</u>
Contact: Bobby Williams / Teresa Dixon	Phone: 9/9-	275-1286
VI. TANK(S) SCHEDULED FOR		
TANK ID# TANK CAPACITY LAST CONT	TENTS	PROPOSED ACTIVITY CLOSURE CHANGE-IN-SERVICE
		Removal Abandonment New Contents Stored
_/ <u>2000 </u>		
VII. OWNER OR OWNER'S A	AUTHORIZED REPRESE	ENTATIVE - PART AND A CARE AND A
Print name and official title TESESA DIXON, DATICE MANAGE	<u>e</u> •sc	heduled Removal Date: 3-193
Signature: Juesa Dixon		Submitted: 2-/-93
"If scheduled work date changes maily your appropriate DEM Recipral Office	e 48 hours prior to originally	scheduled date.

Appendix B

Certificate of Disposal for USTs

CERTIFICATE OF TANK DISPOSAL

Custo	Bo 13	bby's Ba 24 Wile	y Lewis (ervice 🍍		Date April 26, 1993			
	G٢	eensbor	o, N.C.	27406	Transpor	ted by: Bobby's Backhoe			
TANK	#	SIZE	WEIGHT	PRODUCT	RESIDUE	OUE ORIGIN			
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		· .	Total r	esidue	14 gal:	3			

Tanks were disposed in accordance with API 1604, 1987 Removal and Disposal of used Underground Petroleum Storage Tanks. Residue was Disposed in accordance with U.S.EPA Regulations by licensed subcontractor. Lead free scrap steel was recycled by

United Metal Recyclers on 4/22/93

Bru 4. by

Bobby's Backhoe Service, Inc.

1324 WILEY LEWIS ROAD GREENSBORO, N.C. 27406 (919) 275-1286

Guilford County Emergency Services P.O. Box 18807
Greensboro, North Carolina 27419

Date: May 12, 1993

Project Name: A-1 Rentals

Address: 510 N. Elm, Greensboro, N.C. 27401

Date tank(s) removed: 1-2000 gas removed on 4-13-93

Depth of tank: 8' top of tank 3' from ground

Soil Sample Depth: 11'

Any Signs of Leakage: Several small holes in tank

Lab samples taken to: R & A Labs in Kernersville, N.C.

Disposal Of Tank: Safeway Tank Disposal, Colfax, N.C.

Size of Tank: 64" wide and 12' long

Other Comments: lab report shows contamination on East end.

If you have any questions, please feel free to call.

Sincerely,

Teresa Dixon

Bobby's Backhoe Service, Inc.

cc: A-1 Rentals

Appendix C

Laboratory Reports for Soil Samples



RESEARCH & ANALYTICAL LABORATORIES, INC.

Analytical/Process Consultations

22 April 1993

Bobby's Backhoe Service, Inc. 1324 Wiley Lewis Road Greensboro, North Carolina 27406

Attention: Teresa Dixon

Project Name;

A-Rentals

Sample Number	Date <u>Taken</u>	Sample Location	RAL Sample#	EPA Method*	Results (PPM)
East-2000	4/13/93	A-Rentals	165091	5030	1494
West-2000	4/13/93	A-Rentals	165092	5030	<10

*EPA Method 5030 = Total Petroleum Hydrocarbons as Gasoline

PPM = Parts.per million

< = Less than

June 7, 1993

REPORT OF ANALYSIS

Job #: ART30602

Customer: Al Rental

P.O. #: Don Johnson

Samples: #2507 Gas tank North

#2508 Gas tank South #2509 Gas tank East #2510 Gas tank West

#2511 Gas tank bottom @ 17'

RESULTS

	2507	2508	2509	<u>2510</u>	<u>2511</u>
TPH as Gasoline (ppM) by EPA 5030	< 10	< 10	< 10	< 10	< 10

Guilford Laboratories, Inc.

S.P. Rayburn

GUILFUHU LABUHAIUHIESIINS 2005 North Church Street Greensboro, NC. 27405 (919) 274-2907

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Sal Other)

Sample Type: (GW, WWEEK (GW-Ground water | WW-Warte wate

Filtered (Yes / No.) A-None B-HNO C-H3SO D-NeOH Refrigerated (Yes / No) HAZARDS ASSUCTATED WITH SAMPLES Preserved Code: (For Lab Use Only) Comments: Client P.O. Number Receipt Temp: gaset Date Time Date / Time Date / Time College P. During Shipper Name & No. Job Namon CHAIN OF CUSTODY RECORD

Bottles Begrared by: Due Time. Total Number Of Containers Shipper Name & No. Shipper Name & No. Received by (Sit.) Received by (Sig.) Received by (Sig.) Sample Station ID Date / Time Date / Time 15/500 (S.C.G., Unit Time. Sampler's Name 130 Time \propto iRelinquished by (Sig.) Kelinquished by (Sig.) SAMPLER Relinguished by (Sig.) 886-88 Date Client Phone Number ۲ Cuifford Labs Number

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Appendix D

Non-Hazardous Waste Manifest

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11-	. Transporter 2 Company Name		Number	 			
$\ \ '$. Transporter 2 Company Frame	•		·			
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	CARLISLE FARMS INC.			B. Transporter			
	Rt. 1 Box 61 A			C. Facility's Ph			
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ORIGINAL-RETURN TO GENERATOR

Grow 79760 Emph 3,500

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	4. Generator's Phone (EANDO)	C.C.		·						
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	7. Transporter 2 Company Name		ID Number							
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	9: Designated Facility Name and Site Address	10. US EPA	US EPA ID Number		A. Transporter's Phone					
	CARLISLE FARMS INC. Rt. 1 Box 61 A			B. Transporter's Phone C. Facility's Phone						
	Autryville, NC 28318	IS R 0-6 0_	ISR 0-6 0 0 0 3 5		(919)485-3207					
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	16. GENERATOR'S CERTIFICATION: I certify the ma	terials described above on this manifest of	are not subject to federal	regulation for rep	orting proper o	iisposal of Hazardov	s Waste.			
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N S	CARLLY FAIRETS	la	nay face	- Jala		611	125			
TRANSPORTER	18. Transporter 2 Acknowledgement of Receipt of M				-					
PORTER	Printed/Typed Name	Signature				Month Day	Year			
1 H	19. Discrepancy Indication Space	į		· •						
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FAC-							-			
ıί	20. Facility Owner or Operator: Certification of rece	ipt of waste materials covered by th	is manifest except as n	oted in Item 19.	,					
- 	Printed/Typed Name	Signature	De 1	1		Month Day	, Yeur			
	Share Johnson		Dane Jos	mon		1/51/	193			
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		N-HAZARD ASTE MANII	003	. Generator's US	EPA ID No.		Manifest Document No.	2. Page 1 of				
À		s Name and Mailin										45,648
	4. Generator	's Phone ()	5								TIZOTE
		r 1 Company Nam	9		6.	US EPA ID No	umber					
	7. Transporte	er 2 Company Nam	a	<u> </u>	8.	US EPA ID N	umber					
	9. Designate	d Facility Name and	d Site Address	TAC	10.	US EPA ID N	umber	A. Transp B. Transp				
	Rit	See Shipping Name and Dire Address 10. US EPA ID Number A. Hullspotter's Phone C. Facility's Phone C. Facility's Phone 12. Containers 13. 13. 13. 13. 14. 15. 15. 15. 15. 15. 15. 15							07			
	11. Wosto Si	nippling Name and	toplipe IV	C. 2871	8	- } • • • -			1	iners Type	13. Total Quantity	14. Unit Wt/Vol
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	b. (5-70)	5 COA	familiet	on i	1501	:			• •	•	207 -	
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	D. Addition	of Descriptions for a	Materials Listed Abo	o v⊕ .				E. Hand	lling Code	s for W	astes Listed Above	
. N. S. W.												
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	15. Special	Handling Instruction	ns and Additional I	nformation ,								
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· · · · · · · · · · · · · · · · · · ·	16. GENER	ATOR'S CERTIFICA	ATION: 1 certify the	materials described	above on this	manifest are n	or subject to federal	regulations fo	or reporting	proper	disposal of Hazardo	us Waste.
	1 January 1997	Typed Name	ifus	<u> </u>		gnature	e 201	<i>Q:</i>			Month Da	
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£ 1 5 5	Q	Typed Name			S	gnature	· · ·				Month Da	Year
	19. Discrep	ancy Indication Spe	oce					 -				
Name of Street, or other Persons	A C	_ _					·-·-		· 		<u> </u>	
	20. Facility	 -	r: Certification of re	eceipt of waste m			anifest except as r	noted in Item	19.	-27		
	P-mTod	∐yped Name	/d/2	50/	5	ignature	13	-		m	Month Do	y Y•••/ 9·)
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	NON-HAZARDOUS WASTE MANIFEST	1. Generator's US EPA II	D No.	Manifest Document No.	2. Page 1 of		······					
	3. Generator's Name and Mailing Address			—— <i>—</i>								
I ⊢	4. Generator's Phone () 5. Transporter 1 Company Name		US EPA ID No				····					
	7. Transporter 2 Company Name		8. US EPA ID Number									
	9. Pesignated Facility Name and Site Address	Signated Facility Name and Site Address 10. US EPA ID Number 12. Reg 6/-1 12. Reg 6/-1 13. US EPA ID Number 12. Reg 6/-1 13. US EPA ID Number				A. Transporter's Phone B. Transporter's Phone						
	Ph2 Rx 61-A					C. Facility's Phone						
	11. Waste Shipping Name and Description	<u> </u>			'	Containers lo. Type	13. Total Quantity	14. Unit Wt/Vol				
	Gas contemin	cation in	soil									
GEZE	<u> </u>					.] .		S				
RATOR	c.						Ĵ.	#S				
	d.							1005				
	D. Additional Descriptions for Materials Listed	Above		 	E. Handlin	g Codes for	Vastes Listed Abo	ve				
							*					
	15. Special Handling Instructions and Addition	al Information	`.	1		<u> </u>	58,080	165				
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	16. GENERATOR'S CERTIFICATION: 1 certify Printed/Typed Name	the materials described above o	Signature	or subject to federal	regulations for r	eporting proper		ous Waste.				
١	Bobby Williams	t of Materials	Troll	e wil	Vin-		6	93				
TRACOFORTER	Printed Typed Name). Foundate	Signature	nlond	Dita	wille	Month D	37/ ³⁹⁰ /				
	18. Transporter 2 Acknowledgement of Receip Printed/Typed Name	t of Materials	Signature				Month D	Cy Year				
Ē	19. Discrepancy Indication Space					<u>.</u>		<u> </u>				
FACTURE	,	; ;										
,	20. Facility Owner or Operator: Certification o	of receipt of waste material	s covered by this m	anifest except as n	noted in Item 1	9. 						
	Printed/Typed Name		Signature	en Johns	on_		Month C	1. 195				
		ODICINAL	PETION 70	CENEDATOR			es es ate					

ORIGINAL - RETURN TO GENERATOR



HOMEOWNERS & CONTRACTOR TOOLS

510 N. ELM, ST. GREENSBORO, NC 27401 275-9788 1345 S. CHURCH STREET BURLINGTON, NC 27215 226-8287

October 8, 1993

Mr. Larry D. Coble
Dept. of Environmental Health
and Natural Resources
8025 North Point Blvd Suite 100
Winston-Salem, NC 27106 3203

Dear Mr. Coble:

I am in receipt of your letter dated October 1, 1993. This letter is to inform you of the steps taken to date.

Through some misunderstanding of my own as to who was doing what, I thought that this problem had been properly taken care of. Mr. Tom Berry, of Berico Fuels, has been in touch with Ms. Kelly C. Gage, to ascertain what all is needed to dispose of this matter.

The tank was pulled, dirt removed and sent East for disposal. Samples were then taken and tested by Guilford Labs here in Greensboro. These were found to be clear and a new tank was installed and inspected.

Between Berico Fuels and myself, we will have complete information forwarded to you within the next few days. Thank you for your understanding.

Sincerely,

Don Johnson President